

HEATHER E. WILLIAMS, #122664  
Federal Defender  
HANNAH LABAREE, #294338  
Assistant Federal Defender  
801 I Street, 3<sup>rd</sup> Floor  
Sacramento, CA 95814  
Tel: (916) 498-5700  
Fax: (916) 498-5710  
Hannah\_Labaree@fd.org

Attorney for Defendant  
BALBINO SABLAD

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	)	Case No. 2:21-cr-00138-TLN
	)	
Plaintiff,	)	
	)	STIPULATION AND ORDER TO CONTINUE
vs.	)	STATUS CONFERENCE
	)	
BALBINO SABLAD	)	
	)	Date: September 30, 2021
	)	Time: 9:30 a.m.
Defendant.	)	Hon. Troy L. Nunley

---

IT IS HEREBY STIPULATED by and between Phillip A. Talbert, Acting United States Attorney, through Assistant United States Attorney Mira Chernick, attorney for Plaintiff and Federal Defender Heather E. Williams through Assistant Federal Defender Hannah Labaree, attorney for BALBINO SABLAD, that the status conference, currently scheduled for September 30, 2021, be continued to November 18, 2021 at 9:30 a.m.

As of the date of this filing, counsel for the government has produced over 4500 Bates-stamped items of discovery, which defense counsel needs time to review. There is a protective order in place in this case which makes Mr. Sablad's review of certain portions of the material more difficult. As such, defense counsel needs additional time to review discovery, research the applicable law, meet with her client, and otherwise prepare for trial or alternative resolution of the case.

Based upon the foregoing, the parties agree time under the Speedy Trial Act should be

1 excluded from September 30, 2021 through and including November 18, 2021; pursuant to 18  
2 U.S.C. §3161 (h)(7)(A)and (B)(iv)[reasonable time to prepare] and General Order 479, Local  
3 Code T4 based upon continuity of counsel and defense preparation.

4 Dated: September 24, 2021

5 HEATHER E. WILLIAMS  
Federal Defender

6 /s/ Hannah Labaree  
7 HANNAH LABAREE  
Assistant Federal Defender  
8 Attorney for Defendant  
9 BALBINO SABLAD

10 Dated: September 24, 2021

11 PHILLIP A. TALBERT  
Acting United States Attorney

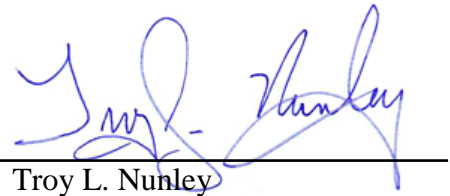
12 /s/ Mira Chernick  
13 MIRA CHERNICK  
Assistant U.S. Attorney  
14 Attorney for Plaintiff  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**ORDER**

IT IS HEREBY ORDERED, the Court, having received, read, and considered the parties' stipulation, and good cause appearing therefore, adopts the parties' stipulation in its entirety as its order. The Court specifically finds the failure to grant a continuance in this case would deny counsel reasonable time necessary for effective preparation, taking into account the exercise of due diligence. The Court finds the ends of justice are served by granting the requested continuance and outweigh the best interests of the public and defendant in a speedy trial.

The Court orders the time from September 30, 2021, up to and including November 18, 2021, shall be excluded from computation of time within which the trial of this case must be commenced under the Speedy Trial Act, pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(iv) [reasonable time for counsel to prepare] and General Order 479, (Local Code T4). It is further ordered the September 30, 2021 status conference shall be continued until November 18, 2021, at 9:30 a.m.

Dated: September 24, 2021

  
Troy L. Nunley  
United States District Judge